

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Samuel Brown, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent (SA) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since July of 2014. I am currently assigned to the Burlington, Vermont Field Office in the Boston Field Division. I attended the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia, full-time, for six-and-a-half months. While at FLETC, I received training in practices and methods of illegal firearm possessors, firearm traffickers, and related federal criminal statutes. As a Special Agent, I have conducted and participated in a number of investigations involving state and federal firearm and controlled substance violations. I have interviewed multiple victims, witnesses, and suspects regarding various types of criminal activity. I have also served search warrants for various crimes and have made criminal arrests for firearm and controlled substance violations. Prior to becoming an ATF SA, I was a Law Enforcement Ranger with the United States National Park Service for approximately seven years. As a Ranger, I participated in state and federal investigations involving possession of illegal weapons, including firearms, as well as possession of controlled substances. I also conducted numerous investigative stops and probable cause searches of people and vehicles. In addition, I participated in physical surveillance operations and in the service of state and federal arrest warrants.

2. This affidavit is submitted to show that probable cause exists to believe that on or about August 25, 2024, Richard Vardenski obstructed commerce by robbery, aiding and abetting thereof and conspiracy to do the same, in violation of 18 U.S.C §§ 1951(a) and 2.

3. The information contained in this affidavit is based on my training and experience, as well as my own investigation and information I received from other agents, law enforcement personnel, and witnesses. This affidavit is intended to show that there is probable cause to believe that Richard Vardenski committed the foregoing offense and does not set forth all facts I know regarding the investigation concerning this matter.

**PROBABLE CAUSE**

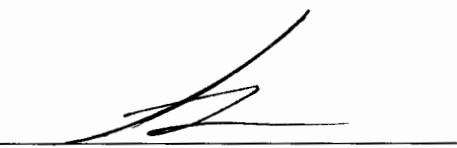
4. On September 6, 2024, I submitted an affidavit in support of a Federal search warrant outlining probable cause to search four cell phones as related to the August 25, 2024 robbery of the One North End Variety store in Burlington, VT. A true and correct copy of the affidavit is attached hereto as Exhibit 1, and it is incorporated herein in its entirety.

5. I know Marlboro 100 cigarettes are manufactured outside of Vermont.

**CONCLUSION**

6. Based on the foregoing, I submit that there is probable cause to believe that on August 25, 2024, Richard Vardenski obstructed commerce by robbery, aiding and abetting thereof and conspiracy to do the same, in violation of 18 U.S.C §§ 1951(a) and 2.

Dated at Burlington, in the District of Vermont, this 7<sup>th</sup> day of November 2024.

  
SAMUEL BROWN  
ATF Special Agent

Sworn to and subscribed before me this 7<sup>th</sup> day of November 2024.

  
HONORABLE KEVIN J. DOYLE  
United States Magistrate Judge